

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal Case No. CR 20-76 (PAM/KMM)

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
vs. )  
)  
MUHAMMAD MASOOD, )  
)  
Defendant. )

**DEFENDANT'S MOTION FOR  
EXTENSION OF DEADLINES**

PLEASE TAKE NOTICE that Defendant Muhammad Masood, through undersigned counsel, hereby moves the Court for an order extending the deadlines currently set for June 8, 2020 for a period of one additional week. These deadlines include the filing of pretrial motions or notification that no pretrial motions will be filed, and informing the Court whether Mr. Masood will consent to video conference hearings. Mr. Masood does not object if there are corresponding extensions to subsequent deadlines and the motions hearing currently scheduled for June 30, 2020. The grounds for this motion are that discussions about resolution of this case were initiated on May 13, 2020. However, the government just provided a proposed plea agreement late yesterday afternoon (June 2). Mr. Masood will probably not receive a copy until at least June 5. There are complex legal issues associated with resolution and potentially grave consequences. There are also complex considerations regarding whether to consent to video conference hearings. Undersigned counsel does not believe that the June 8 deadlines will provide adequate time for him to fully discuss all of these complex issues

with Mr. Masood and for Mr. Masood to make an informed decision about how to move forward.

The prosecution has informed undersigned counsel that it has no objection to this proposed extension.<sup>1</sup>

Dated: June 3, 2020

LAW OFFICE OF JORDAN S. KUSHNER

By s/Jordan S. Kushner

Jordan S. Kushner, ID 219307

Attorney for Defendant

431 South 7th Street, Suite 2446

Minneapolis, Minnesota 55415

(612) 288-0545

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<sup>1</sup> It does not appear that the requested extension is long enough to necessitate a waiver of speedy trial rights.